

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

PURDUE PHARMA L.P., *et al.*,

Case No. 19-23649 (SHL)

Debtors.<sup>1</sup>

(Jointly Administered)

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PURDUE PHARMA L.P., PURDUE PHARMA INC.,  
PURDUE PHARMA MANUFACTURING L.P., PURDUE  
PHARMACEUTICALS L.P., PURDUE TRANSDERMAL  
TECHNOLOGIES L.P., PURDUE PHARMACEUTICAL  
PRODUCTS L.P., PURDUE PHARMA OF PUERTO RICO,  
RHODES PHARMACEUTICALS L.P., RHODES  
TECHNOLOGIES, and AVRIO HEALTH L.P.,

Adv. No. 21-07005-shl

Plaintiffs.

-against-

AIG SPECIALTY INSURANCE COMPANY (F/K/A  
AMERICAN INTERNATIONAL SPECIALTY LINES  
INSURANCE COMPANY); ALLIED WORLD  
ASSURANCE COMPANY, LTD.; AMERICAN  
GUARANTEE AND LIABILITY INSURANCE COMPANY;  
AMERICAN INTERNATIONAL REINSURANCE  
COMPANY (F/K/A STARR EXCESS LIABILITY  
INSURANCE INTERNATIONAL LIMITED); ARCH  
REINSURANCE LTD.; ASPEN AMERICAN INSURANCE  
COMPANY; CERTAIN MEMBER COMPANIES OF THE  
INTERNATIONAL UNDERWRITING ASSOCIATION OF  
LONDON SUBSCRIBING TO POLICY NO.  
823/KE0002108; CHUBB BERMUDA INSURANCE LTD.  
(F/K/A ACE BERMUDA INSURANCE LTD.); EVANSTON  
INSURANCE COMPANY; GULF UNDERWRITERS  
INSURANCE COMPANY; HDI GLOBAL SE (F/K/A

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

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GERLING-KONZERN GENERAL INSURANCE  
COMPANY); IRONSHORE SPECIALTY INSURANCE  
COMPANY (F/K/A TIG SPECIALTY INSURANCE  
COMPANY); LIBERTY INSURANCE CORPORATION;  
LIBERTY MUTUAL FIRE INSURANCE COMPANY;  
LIBERTY MUTUAL INSURANCE COMPANY; LIBERTY  
MUTUAL INSURANCE EUROPE SE (F/K/A LIBERTY  
INTERNATIONAL INSURANCE COMPANY); NATIONAL  
UNION FIRE INSURANCE COMPANY OF PITTSBURGH,  
PA; NAVIGATORS SPECIALTY INSURANCE COMPANY;  
NORTH AMERICAN ELITE INSURANCE COMPANY; ST.  
PAUL FIRE AND MARINE INSURANCE COMPANY;  
STEADFAST INSURANCE COMPANY; SWISS RE  
INTERNATIONAL S.E. (F/K/A SR INTERNATIONAL  
BUSINESS INSURANCE COMPANY; ALSO F/K/A  
ZURICH REINSURANCE (LONDON) LIMITED);  
TENECOM LIMITED (F/K/A WINTERTHUR SWISS  
INSURANCE COMPANY); XL BERMUDA LTD. (F/K/A  
XL INSURANCE COMPANY, LTD.); XL INSURANCE  
AMERICA, INC.,

Defendants.

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**JOINT PROPOSED AMENDED SCHEDULING AND PRE-TRIAL ORDER**

The parties respectfully propose the following Joint Amended Scheduling and Pre-Trial Order, to replace the Amended Scheduling and Pre-Trial Order entered on April 22, 2022 (Adv. Doc. 224):

1. All fact discovery shall be completed by February 17, 2023.

In the event of a dispute over discovery, the parties' counsel shall promptly confer to attempt in good faith to resolve the dispute. If, notwithstanding their good faith efforts to do so, they are unable to resolve a discovery issue, they shall promptly request a discovery conference.

2. On January 13, 2023, the parties shall disclose the identity of any expert expected to testify at trial. The disclosure shall include the name and position of the expected testifying expert, and provide a brief description of the subject matter of the expected testimony. This paragraph does not apply to rebuttal experts.
3. Expert disclosures in the form and substance provided by Federal Rule of Civil Procedure 26(a)(2) and any applicable Federal Rules of Bankruptcy Procedure, local rules of the Southern District of New York, or chamber rules of Judge Lane shall be served by March 17, 2023; rebuttal expert disclosures shall be served by

April 21, 2023; and expert depositions shall be completed by May 26, 2023.

4. Any party may file a motion for summary judgment under Fed. R. Bankr. P. 7056, subject to the requirements of Local Bankruptcy Rule 7056-1(a). Any motions for summary judgment under Fed. R. Bankr. P. 7056 shall be filed and served no later than June 23, 2023; oppositions shall be due forty-five (45) days after any such motion is filed and served; and, if the movant deems it necessary to file a reply, the reply must be filed and served thirty (30) days after the opposition is filed and served.<sup>2</sup> The parties will coordinate with each other to select a mutually-acceptable hearing date that the Court has available prior to filing any such motions.
5. If there are no pending motions for summary judgment on [July 20, 2023], the Court will hold a final pretrial conference on that date. If there are pending motions for summary judgment on that date, the final pretrial conference shall take place approximately 45 days after the Court issues its decision on the pending motion or motions for summary judgment.
6. In advance of the final pretrial conference, the parties shall meet and confer and provide the Court with a joint pre-trial order as directed by the Court.
7. Nothing herein shall be deemed consent by any party to a trial in this Court or to entry of final judgment by this Court.

**SO ORDERED:**

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Hon. Sean H. Lane  
United States Bankruptcy Judge

Dated: White Plains, New York

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<sup>2</sup> To the extent reasonably possible, co-plaintiffs and insurer defendants, respectively, shall use best efforts to file consolidated pleadings.